

EXHIBIT B

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

JAMES HAYDEN,

CASE NO: 1:17CV2635

Plaintiff,

v.

2K GAMES, INC., et al.,

Defendants.

Deposition of JAMES HAYDEN

Cleveland, Ohio

Wednesday, October 30, 2019 - 9:04 a.m.

Reported by:

Angela Nixon, RMR, CRR

Job No.: 26345

1 MR. MCMULLEN: Objection, asked and answered.

2 A. I'm not sure what I would charge you. You'd have
3 to walk in and we'll find out.

4 Q. Well, you knew what you did with Mr. James, he
5 came in and -- and he talked to you, and you sketched it
6 out you said, and you put it on him and then you inked it,
7 right?

8 A. Yes.

9 Q. All right. So if you did that same thing today,
10 what would you have charged him?

11 MR. MCMULLEN: Objection.

12 A. If LeBron walked in and got the same tattoo?

13 Q. Correct.

14 A. \$600.

15 Q. Did you actually charge him 600?

16 MR. MCMULLEN: Objection.

17 A. I don't remember.

18 Q. Isn't it true that you charged him a lot less
19 than \$600?

20 MR. MCMULLEN: Objection.

21 A. Not sure.

22 Q. Do you have any records of how much you charged?

23 A. No.

24 Q. So you can't approximate in any way, you have no
25 recollection of how much you charged him for the Gloria

1 a cool way to think about it though.

2 Q. Did you have a conversation with him about how he
3 was a star so stars would be good --

4 MR. MCMULLEN: Objection.

5 Q. -- to pick?

6 MR. MCMULLEN: Sorry.

7 A. I don't remember that.

8 Q. Well, what can you recall, if anything, about the
9 conversations, if any, you had with him when this star
10 design was being made?

11 A. I pulled out the Sharpies, I'm going to draw
12 something cool on you, tell me if you like it.

13 Q. And did he approve it?

14 A. It's on his arm.

15 Q. So he approved it, right?

16 A. Yes.

17 Q. And he approved where it was going to be, and he
18 approved the design, correct?

19 MR. MCMULLEN: Objection.

20 A. Yes.

21 Q. And then you inked it, right?

22 A. Yeah.

23 Q. And when you inked this design on Mr. James, you
24 don't recall whether you gave him any papers to sign,
25 right?

1 VIDEOGRAPHER: On the record at 11:06.

2 BY MS. CENDALI:

3 Q. Mr. Hayden, I don't remember if I asked you this,
4 did you -- do you remember how much you charged Mr. James
5 for the lion tattoo?

6 A. I can't remember.

7 Q. Can you approximate in any way how much?

8 MR. MCMULLEN: Objection.

9 A. No.

10 Q. Can you approximate what you would charge me if I
11 went in and wanted that tattoo today?

12 A. No.

13 Q. Let's talk about Danny Green. When was -- how
14 did it come about that you first inked a tattoo on Danny
15 Green?

16 A. I think he came in with LeBron.

17 Q. Did Mr. James introduce you to Mr. Green?

18 A. I'm not sure who introduced us.

19 Q. So when you say he came in with LeBron, do you
20 mean he came to one of Mr. James' tattoo sessions, or they
21 came in -- what do you mean?

22 A. I think he came into one of his tattoo sessions.

23 Q. And so when did you first ink a tattoo on
24 Mr. Green?

25 A. I can't remember the date.